

September 13, 2006

The Honorable Vernon A. Williams  
Secretary  
Surface Transportation Board  
1925 K St. N.W.  
Washington, D.C.

RE: Ex Parte 646 (Sub-No. 1), *Simplified Standards For Rail Rate Cases*

Dear Secretary Williams:

The undersigned, as counsel for The National Industrial Transportation League, respectfully requests the Board to provide any and all workpapers underlying the Board's decision served July 28, 2006 in the above proceeding, including but not limited to:

- Workpapers showing the calculation of each of the eligibility estimates summarized in Table 2 on page 37 of the Board's decision, including analyses using the Board's Waybill Sample and analyses concerning the impact of the Board's aggregation proposal, i.e. "[i]f a complaint challenges multiple rates covering different origins and destinations, the Board would aggregate the MVC for each set of movements covered by the complaint."
- Estimates concerning the time and cost of performing a SSAC analysis or a Three Benchmark presentation, including estimates which may be associated with the Board's statement on page 11 that the "[t]he time and expense associated with this inquiry dwarfs those needed to examine the replacement cost of the necessary rail infrastructure."
- Analyses or evaluations concerning the application of the proposed SSAC standard and the proposed changes to the Three Benchmark approach, including the application of the proposed SSAC standard or the Three-Benchmark approach on sample movements or which compare the results with movements in which the Board applied the Full-SAC standard.
- Analyses or evaluations concerning the economic impact of its proposals, including any and all analyses associated with its proposed departure from the full-SAC standard to the proposed Simplified-SAC standard.
- Workpapers showing the calculation of the RSAM and R/VC total figures under the STB's proposed methodology contained in Table 1 on Page 25 of the STB's decision.
- The indices used to index the Total RPI included in Table A-1 on Page 39 of the STB's decision to 2005 price levels.
- Workpapers showing the calculations of average land costs per acre contained in Table A-2 on Page 40 of the decision.

Nick.DiMichael@ThompsonHine.com Phone 202.263.4103 Fax 202.331.8330

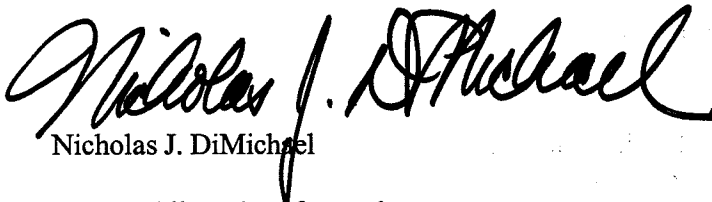
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- Workpapers showing the development of the earthwork unit costs contained in Table A-3 on Page 42 of the decision.
- Workpapers showing the development of the total cost of Other Earthwork investment included in Table A-4 on Page 42 of the decision.
- Workpapers showing the development of the total track construction costs included in Table A-5 on Page 43 of the decision.
- Workpapers showing the development of the bridge construction costs per foot included in Table A-6 on Page 43 of the decision.
- Workpapers and underlying data supporting the regression equations shown in Table A-7 on Page 44 of the STB's decision, including the independent and dependent variable data sets, and the output statistics from the least-square regression analyses, i.e., coefficient of determination ( $R^2$ ), the standard error of the coefficient of determination, the standard errors of the coefficients, and the p-values of the coefficients.
- Workpapers showing the development of the signaling and communications investment included in Table A-8 on Page 46 of the decision.
- Workpapers showing the development of the total building and facilities investment included in Table A-9 on Page 47 of the decision.
- Workpapers showing the development of the total public improvement investment, excluding grade separations, included in Table A-10 on Page 48 of the decision.

Sincerely,



Nicholas J. DiMichael

cc: All parties of record